



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

DEVAL L. PATRICK
Governor

MAEVE VALLELY BARTLETT
Secretary

DAVID W. CASH
Commissioner

July 10, 2014

James E. Dowling
Chief Engineer
Hillcrest Hospital
165 Tor Court
Pittsfield, MA 01201

Re: Pittsfield
Regulation 310 CMR 7.02(11)
25% Facility
Emission Cap Notification

Dear Mr. Dowling:

On June 30, 2014, the Department of Environmental Protection, Bureau of Waste Prevention, Western Region ("MassDEP") received a BWP AQ Emissions Notification Form requesting a 25% emission cap for your facility. Enclosed for your files is a copy of the form as processed by the MassDEP. The MassDEP hereby approves the 25% emission cap, which means that the facility's potential emissions will be limited to the levels established at 310 CMR 7.02(11)(f).

As of June 30, 2014 the Restricted Emission Status (RES) of the facility is rescinded (1-R-95-033, #116664, dated March 13, 2006). However, Hillcrest Hospital is subject to annual RES reporting for the partial 2014 reporting year (January 1, 2014 thru June 30, 2014, due by March 15, 2015).

Compliance with this facility-wide emission cap defers your facility's future applicability to any otherwise applicable major source requirements (e.g. the requirement to obtain an operating permit pursuant to 310 CMR 7.00: Appendix C).

As stated at 310 CMR 7.02(11)(b), operation under this facility-wide emission cap does not relax or eliminate any emission limitations or recordkeeping requirements established by regulation or by previously issued source-specific plan approvals or emission control plans. In addition, it does not eliminate the preconstruction plan approval requirements of 310 CMR 7.02.

Regulation 310 CMR 7.02(11) contains specific recordkeeping and reporting requirements for an owner or operator who accepts an emission cap. Compliance with these requirements is an integral part of maintaining compliance with the emission cap. The following recordkeeping and reporting requirements apply to your facility:

The owner or operator shall establish and maintain records of actual emissions. Such information shall be summarized in a monthly log, maintained on site for five years, and be made available to the MassDEP or U.S. Environmental Protection Agency staff upon request. Such records shall contain the following items where applicable:

1. Coating or Solvent Usage.

- a. A list of process related coatings, solvents, inks and adhesives in use. This list shall include: information on the VOC and HAPs content in lbs per gallon as applied;
- b. A description of production equipment including type, make and model; maximum design process rate or throughput; control device(s) type and description (if any); and a description of the coating/solvent application/drying method(s) employed;
- c. A monthly log of the gallons consumed of each production solvent (including solvents used in clean-up and surface preparation), coating, ink and adhesive used;
- d. All purchase orders, invoices, and other documents to support information in the monthly log; and
- e. The emissions of VOC from any coating used in small amounts are exempt from the emission limitations provided the amount of all coatings exempted does not exceed 55 gallons on a rolling 12 month period. A list of coatings used in small amounts shall be established and records of the consumption of these coatings shall be maintained.

2. Organic Liquid Storage.

- a. A monthly log identifying the liquid stored and monthly throughput;
- b. Information on the tank design and specifications including control equipment; and

3. Fuel Utilization Facility.

- a. Information on equipment type, make and model, maximum power input/output, minimum operating temperature and capacity, control equipment and all source test information;
- b. A monthly log of hours of operation, fuel type, fuel usage in gallons or tons as appropriate, fuel heating value, percent sulfur for fuel oil and coal; and
- c. All purchase orders, invoices, and other documents to support information in the monthly log.

4. Air Pollution Control Equipment.

- a. Information on equipment type and description, make and model, and emission units served by the control unit;

- b. Information on equipment design including where applicable: pollutants(s) controlled; control effectiveness; maximum design or rated capacity; inlet and outlet temperatures, and concentrations for each pollutant controlled; catalyst data (type, material, life, volume, space velocity, ammonia injection rate and temperature); baghouse data (design, cleaning method, fabric material, flow rate, air/cloth ratio); electrostatic precipitator data (number of fields, cleaning method, and power input); scrubber data (type, design, sorbent type, pressure drop); other design data as appropriate; all source test information; and
- c. A monthly log of hours of operation including notation of any control equipment breakdowns, upsets, repairs, maintenance and any other deviations from design parameters.

5. Not Otherwise Classified Process.

- a. Information on the process and equipment including the following: equipment type, description, make and model, maximum design process rate or throughput, control device(s) type and description (if any);
- b. Any additional information requested in writing by the Department;
- c. A monthly log of operating hours, each raw material used and its amount; and
- d. Purchase orders, invoices, and other documents to support information in the monthly log.

If you have any questions, please contact Amy Stratford of the Western Regional Office at (413) 755-2144.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Marc Simpson
Air Quality Permit Chief
Bureau of Waste Prevention
Western Region

ecc: Saadi Motamedi, C & E Chief, DEP WERO
Peter Czapienski, Bureau of Waste Prevention, DEP WERO
Yi Tian, Bureau of Waste Prevention, DEP Boston

Enclosure